

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:25-cv-2376
MDL No. 3047

This Document Relates to:
MONROE COUNTY, MICHIGAN,
Plaintiff v.
META PLATFORMS, INC., et al., Defendants.

**LOCAL GOVERNMENT AND SCHOOL
DISTRICT MASTER SHORT-FORM
COMPLAINT AND DEMAND FOR JURY
TRIAL**

Member Case No.:

The Plaintiff(s) named below file(s) this *Short-Form Complaint and Demand for Jury Trial* against the Defendant(s) named below by and through their undersigned counsel. Plaintiff(s) incorporate(s) by reference the allegations, claims, and relief sought in *Plaintiffs' Master Local Government and School District Complaint* ("Master Complaint") as it relates to the named Defendant(s) (checked-off below), filed in *In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, in the United States District Court for the Northern District of California. Plaintiff(s) file(s) this *Short-Form Complaint* as permitted by Case Management Order No 8.

Plaintiff(s) indicate(s) by checking the relevant boxes below the Parties and Causes of Actions specific to Plaintiff(s)' case.

1 Plaintiff(s), by and through their undersigned counsel, allege(s) as follows:

2 **I. DESIGNATED FORUM**

- 3 1. *For Direct Filed Cases:* Identify the Federal District Court in which the Plaintiff(s)
would have filed in the absence of direct filing:

4 United States District Court of the Northern District of California.

- 5
6
7 2. *For Transferred Cases:* Identify the Federal District Court in which the Plaintiff(s) originally filed and the date of filing:
8

9
10
11 **II. IDENTIFICATION OF PARTIES**

12 A. **PLAINTIFF(S)**

- 13 3. *Plaintiff(s):* Name(s) of the local government or school district alleging claims
14 against Defendant(s):

15 Monroe County, Michigan

- 16
17 4. Number of schools served in the Plaintiff(s)' school district or local
18 community:

19 There are 9 school districts with approximately 42 public schools in Monroe County.

- 20
21 5. Number of minors served in the Plaintiff(s)' school district or local
22 community:

23 There are approximately 19,982 students enrolled in grades K-12 in Monroe County public schools;
24 the U.S. Census indicates there are 24,850 people aged 5-17 in Monroe County, Michigan.

- 25
26 6. At the time of the filing of this *Short-Form Complaint*, Plaintiff(s) is/are a resident
27 and citizen of [Indicate State]:

28 The State of Michigan.

B. DEFENDANT(S)

1 7. Plaintiff(s) name(s) the following Defendant(s) in this action [*Check all that apply*]:

META ENTITIES

- META PLATFORMS, INC.,
formerly known as Facebook, Inc.
- INSTAGRAM, LLC
- FACEBOOK PAYMENTS, INC.
- SICULUS, INC.
- FACEBOOK OPERATIONS, LLC
- FACEBOOK HOLDINGS, LLC
- META PAYMENTS INC.

TIKTOK ENTITIES

- BYTEDANCE LTD
- BYTEDANCE INC.
- TIKTOK LTD
- TIKTOK LLC
- TIKTOK INC.

SNAP ENTITY

- SNAP, INC.

GOOGLE ENTITIES

- GOOGLE, LLC
- YOUTUBE, LLC

OTHER DEFENDANTS

15 For each “Other Defendant” Plaintiff(s) contends are additional parties and are liable
 16 or responsible for Plaintiff(s)’ damages alleged herein, Plaintiff(s) must identify by
 17 name each Defendant and its citizenship, and Plaintiff(s) must plead the specific facts
 18 supporting any claim against each “Other Defendant” in a manner complying with the
 requirements of the Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may
 attach additional pages to this *Short-Form Complaint*.

NAME	CITIZENSHIP
Alphabet Inc.	Delaware, California
XXVI Holdings Inc.	Delaware, California
Facebook Technologies, LLC	Delaware, California
Discord Inc.	Delaware, California
Roblox Corporation	Delaware, California

1 **III. CAUSES OF ACTION ASSERTED**

2 8. The following Causes of Action asserted in the *Master Complaint*, and the allegations
 3 with regard thereto, are adopted in this *Short-Form Complaint* by reference (*check all*
 4 *that are adopted*):

4 Asserted Against¹	5 Count Number	6 Cause of Action (COA)
7 <input checked="" type="checkbox"/> Meta entities 8 <input checked="" type="checkbox"/> Snap <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input checked="" type="checkbox"/> Other Defendant(s) ²	9 1	10 NEGLIGENCE
11 <input checked="" type="checkbox"/> Meta entities <input checked="" type="checkbox"/> Snap <input checked="" type="checkbox"/> TikTok entities <input checked="" type="checkbox"/> Google entities <input checked="" type="checkbox"/> Other Defendant(s)	12 2	13 PUBLIC NUISANCE

14 **NOTE**

15 If Plaintiff(s) want(s) to allege additional Cause(s) of Action other than those selected in paragraph
 16 8, which are the Causes(s) of Action set forth in the *Master Complaint*, the facts supporting those
 17 additional Cause(s) of Action, must be pled in a manner complying with the requirements of the
 18 Federal Rules of Civil Procedure. In doing so, Plaintiff(s) may attach additional pages to this
 19 *Short-Form Complaint*.

20 **IV. ADDITIONAL CAUSES OF ACTION**

21 9. Plaintiff(s) assert(s) the following additional Causes of Action and supporting
 22 allegations against the following Defendants:

23 Violation of the Michigan Consumer Protection Act, Mich. Comp. Laws Section 445.901, et al., against
 24 all Defendants, and Fraudulent Misrepresentation and Concealment against all Defendants.

25 See Attachment A: SUPPORTING ALLEGATIONS REGARDING SHORT-FORM COMPLAINT
 26 AND DEMAND FOR JURY TRIAL.

27 ¹ For purposes of this paragraph, “entity” means those Defendants identified in Paragraph 7 (e.g.,
 28 “TikTok entities” means all TikTok Defendants against which Plaintiff(s) is/are asserting claims).

29 ² Reference selected “Other Defendants” by the corresponding row number in the “Other
 30 Defendant(s)” chart identified in Paragraph 7.

WHEREFORE, Plaintiff(s) pray(s) for relief and judgment against Defendants and all such further relief that this Court deems equitable and just as set forth in the *Master Complaint*, and any additional relief to which Plaintiff(s) may be entitled.

JURY DEMAND

Plaintiff(s) hereby demand a trial by jury as to all claims in this action.

* * * *

By signature below, Plaintiff(s)' counsel hereby confirms their submission to the authority and jurisdiction of the United States District Court of the Northern District of California and oversight of counsel's duties under Federal Rule of Civil Procedure 11, including enforcement as necessary through sanctions and/or revocation of *pro hac vice* status.

/s/ Aelish M. Baig

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ATTACHMENT A

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13 Attorneys for Plaintiff

14 [Additional counsel appear on signature page.]

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 OAKLAND DIVISION

18 In re SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION) MDL Case No. 4:22-md-03047-YGR
19 This Document Relates To:) SUPPORTING ALLEGATIONS
20 MONROE COUNTY, MICHIGAN,) REGARDING SHORT FORM COMPLAINT
21 Plaintiff,) AND DEMAND FOR JURY TRIAL
22 vs.)
23 META PLATFORMS, INC., et al.,)
24 Defendants.)
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I. ADDITIONAL ALLEGATIONS

1. Monroe County residents have borne painful witness to the devastating impact of social media.

2. Like virtually everywhere in the United States now, Monroe County's youth suffer from a high degree of distraction, depression, suicidality, and other mental disorders caused by or worsened by the overconsumption of social media on a daily basis, which substantially interferes with the rights of health and safety common to the general public. Indeed, youth in Monroe County, surveyed in 2022, reported high levels of depression and suicidal ideation.¹ To address these issues, Monroe County has funded mental health services including youth outpatient therapy, crisis stabilization services for children and teens, youth peer-support groups, caregiving coaching, and youth diversion services. The need is that great.

THE PARTIES

A. Plaintiffs

3. Plaintiff Monroe County, Michigan is a county organized and existing under the laws of the State of Michigan. It is located at 125 East Second Street, Monroe, Michigan 48161-2197. It includes 24 cities, villages, and townships² across 549 square miles and has a population of nearly 155 thousand people.³ There are approximately 24,850 children aged 5-17 residing in the county.⁴

4. Plaintiff Monroe County helps fund a wide range of services and programs which directly address the mental health of its youth, including youth outpatient therapy, crisis stabilization services for children and teens, youth peer-support groups, caregiving coaching, school resource officers, and youth diversion services. Plaintiff Monroe County brings this action on its own behalf.

¹ Monroe County, Michigan Profile for Healthy Youth (MiPHY) (2022) [https://misdhr.com/michigan-profile-for-healthy-youth-mipyh/](https://misdhr.com/michigan-profile-for-healthy-youth-miphy/).

² <https://www.co.monroe.mi.us/503/Township-Cities-Villages-in-Monroe-Count>.

³ About Monroe County, Monroe County Michigan, <https://www.oakgov.com/government/about-Monroe-county>.

⁴ Facts and Stats, Monroe County Michigan, <https://www.oakgov.com/business/business-development/facts-and-stats>.

1 **B. Additional Defendants**

2 5. Defendant Alphabet Inc. (“Alphabet”) is a Delaware corporation with its principal
 3 place of business in Mountain View, California. Alphabet is the sole stockholder of XXVI
 4 Holdings Inc.

5 6. Defendant XXVI Holdings Inc. is a Delaware corporation with its principal place of
 6 business in Mountain View, California. XXVI Holdings Inc. is a wholly-owned subsidiary of
 7 Alphabet and the managing member of Google LLC.

8 7. Defendant Meta Platforms, Inc.’s (“Meta” or “Company”) subsidiary, defendant
 9 Facebook Technologies, LLC (“Facebook Technologies”), was organized under the laws of the State
 10 of Delaware as “Oculus VR, LLC” on March 21, 2014, and acquired by Meta on March 25, 2014.
 11 Facebook Technologies develops Meta’s virtual and augmented reality technology, such as the Meta
 12 Quest line of services, among other technologies, related to Meta’s platforms, and its principal place
 13 of business is in Menlo Park, California. Defendant Meta is the sole member of Facebook
 14 Technologies.

15 8. Defendant Discord Inc. (“Discord”) is a Delaware corporation. Its principal place of
 16 business is in San Francisco, California. Its primary product, a social media platform called Discord,
 17 was launched in 2015 and is widely available throughout the United States.

18 9. Defendant Roblox Corporation (“Roblox”) is a Delaware corporation with its
 19 principal place of business in San Mateo, California. Roblox launched its eponymous online gaming
 20 platform in 2006, which is widely available to users throughout the United States.

21 **C. Additional Allegations Relating to Defendant Discord**

22 10. Discord is an instant messaging and social media platform that allows for users to
 23 communicate with each other through private and group-based messaging, including through text,
 24 photos, videos, and video calls. It can be likened to a series of chat rooms and groups in which users
 25 can engage in conversation with others. It was launched in 2015. As of January 2024, the platform
 26 had more than 196 million active users each month.⁵ As noted by co-founder and CEO Jason Citron

27 ⁵ Werner Geyser, *The Latest Discord Statistics: Servers, Revenue, Data, and More*, Influencer
 28 Marketing Hub (Jan. 30, 2024), <https://influencermarketinghub.com/discord-stats/>.

1 at the January 31, 2024 Congressional hearing, more than 60% of Discord's active users are between
 2 the ages of 13 and 24 years old.⁶

3 11. Discord generates revenue through user subscription fees that gives users access to
 4 features like custom emojis for \$5 or \$10 per month. Discord also generates revenue through access
 5 to its server, of which the company takes a 10% cut.⁷

6 12. Discord has designed, developed, produced, operated, promoted, distributed, and
 7 marketed its platforms to attract, capture, and addict youth, with minimal parental oversight. Not
 8 only are Discord's features engineered to induce compulsive use by young people, it has also failed
 9 to reasonably protect child users and help limit and prevent child sexual exploitation, sextortion, and
 10 distribution of known Child Sexual Assault Material ("CSAM") by failing to implement certain
 11 design features that prioritize children's safety.

12 13. Discord has designed and operates its product in such a way that it also allows people
 13 to chat using fake names; and the task of enforcing community standards is largely delegated to the
 14 organizers of individual Discord groups, called "servers."⁸ By default, all users – including users
 15 under 18 years old – can receive friend invitations from anyone in the same server, which opens the
 16 ability for them to send and receive private messages from strangers.⁹

17 14. Discord's dangerous and harmful design features include, *inter alia*, a lack of reliable
 18 age verification to determine users' ages; failure to implement effective parental controls; failure to
 19 implement effective parental notifications; failure to enable default protections for youth in order to
 20 protect against compulsive use or overuse of the product; and a lack of community safety

22 ⁶ Adi Robertson, *Meta, TikTok, and other tech companies go to Congress: all the news*, Verge
 23 (Jan. 31, 2024), <https://www.theverge.com/2024/1/31/24056136/congress-child-safety-hearing-kosameta-x-discord-snap-tiktok/archives/2>.

24 ⁷ Kellen Browning, *How Discord, Born From an Obscure Game, Became a Social Hub for Young*
 25 *People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

26 ⁸ *Id.*

27 ⁹ Samantha Murphy Kelly, *The dark side of Discord for teens*, CNN Bus. (Mar. 22, 2022),
 28 <https://www.cnn.com/2022/03/22/tech/discord-teens/index.html>.

1 precautions to prevent adults from preying on children, such as false assurances that certain features
 2 will keep users safe and downplaying the dangers of its product to youth users.

3 15. Discord's terms of use prohibit users under 13 years old, but Discord does not verify
 4 user age or identity. There is no parental notification to parents when a youth user signs up for a
 5 new account. Because it has failed to implement a robust and effective age verification process,
 6 there are children aged 13 and under using the product; in fact, Discord is aware that children as
 7 young as eight years old are currently using the product.¹⁰ Discord has access to information within
 8 its platform to identify the age of its users because youth users often state their real age in their bio
 9 and/or tell other users their real age in group and private chats using one or more Discord product
 10 features. Youth users also post photos that often reflect their actual age.

11 16. In many cases, youth users are able to access Discord throughout the school day
 12 because it is not one of the applications that is blocked on school networks, such as Snapchat and
 13 Instagram.¹¹

14 17. Discord has failed to implement safety features such that there is an unreasonable
 15 opportunity for and risk of sexual exploitation of youth on the platform. By default, all product users
 16 – including users under 18 years old – can receive friend invitations from anyone in the same server,
 17 which opens the ability for them to send and receive private messages from strangers.¹² Discord has
 18 failed to implement effective parental controls to prevent such activity from causing harm to youth.
 19 Discord has failed to implement effective tools for youth/parent users to choose to avoid such
 20 problematic and harmful experiences.

21 18. Discord's purported "safety" features create a false sense of security on the platform,
 22 which create an unreasonable risk of harm to youth. For instance, until in or around October 2023,

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 25 ¹⁰ Kellen Browning, *How Discord, Born From an Obscure Game, Became a Social Hub for Young*
 26 *People*, N.Y. Times (Dec. 29, 2021), <https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

27 ¹¹ *The dark side of Discord for teens*, *supra* n.9.

28 ¹² *Id.*

1 the Discord support pages described the platform’s “Safe Direct Messaging” options in the following
 2 ways:

- 3 • Keep me safe: the safest option. This will have Discord scan any image sent in all
 4 DMs, regardless of whether you’ve added the user on your friend list, or the user is
 4 DMing you just by sharing a mutual server.
- 5 • My friends are nice: The medium-est option! This will let Discord know to scan any
 6 images sent in DMs from users that aren’t on your friends list, but also to trust your
 6 previously-added friends and not worry about any images they send.
- 7 • Do not scan: The self-confident option. Enabling this option will completely disable
 8 Discord’s image scanning process, and leave you for a walk on the wild side for any
 9 and all DMs you receive. Careful, it’s a jungle out there!

10 19. These representations reasonably would lead youth users to believe that Discord will
 11 scan for and block sexually explicit materials, including materials used to groom and/or blackmail
 12 youth users. Discord should not be offering less-safe options (“My friends are nice” and “Do not
 13 scan”)¹³ to youth users without parental consent. The less-safe options as product features are
 14 further defective and/or dangerous for youth users because they downplay the risks of sexually
 15 explicit and/or otherwise harmful content through direct messaging, with descriptions such as “the
 16 wild side” and “a jungle,” and suggesting that the “Do not scan” option is “The self-confident
 17 option.” This creates a false sense of security that results in direct harm to Discord’s youth users.

18 20. Further, the safe messaging features do not operate as promised. The “Keep me safe”
 19 option, as described, would reasonably lead a youth user to understand that Discord’s scanning
 20 service would keep them “safe” from predatory users and sexually explicit and/or otherwise harmful
 21 content. However, Discord’s safety scanning service did not do even that. This option filters

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¹³ *Id.*

1 explicit context received in direct messages only, not those received through group messaging.¹⁴

2 The viewing and trading of CSAM is rampant via Discord.¹⁵

3 21. Discord's complete lack of parental controls also presents an unreasonable risk of
4 harm to youth users. This allows youth to use the platform and be exposed to the risks of trauma,
5 abuse, grooming, and exploitation through use of the product, all under the false impression that
6 Discord is taking affirmative action to keep the users safe.

7 22. Youth users on Discord are exposed to sexual predators, who contact them over the
8 platform, cultivate emotional connections, and engage in "grooming" in order to exploit, manipulate,
9 and abuse such youth users.¹⁶ Youth are exposed to self-harm chats, including shared tips on how to
10 hide cutting and other self-harm from parents, and suggested advice on how to run away from home
11 (in at least one reported instance to meet up with an adult met through the platform).¹⁷

12 23. Discord does not provide effective warnings to youth users or parents regarding the
13 unreasonable risk of harm to youth in using the product. It makes it difficult for parents or other
14 visitors of the platform to report CSAM, other inappropriate or harmful content, or predatory user
15 accounts without needing to either log into the platform or have significant information only
16 obtainable from the platform.

17 24. Discord has additional product defects that encourage compulsive use and overuse of
18 its product. For instance, Discord does not provide an option to users to self-restrict time on the
19 platform.

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21 ¹⁴ Letter from Patrick Trueman and Dawn Hawkins, End Sexual Exploitation, to Jason Citron, CEO
22 of Discord, April 26 2023, https://endsexualexploitation.org/wp-content/uploads/Discord-Notification-Letter_DDL-2023_FINAL_Redacted.pdf.

23 ¹⁵ *Id.; Afraid, Uncertain, and Overwhelmed: A Survey of Parents on Online Sexual Exploitation of
24 Children*, Parents Together Action (2023), https://parentstogetheraction.org/wp-content/uploads/2023/03/PT_PDF_final-2.pdf.

25 ¹⁶ See Dee Dee Gatton, *Discord app raises safety concerns as experts warn of sexual exploitation
26 risks*, 24 News (June 22, 2023), <https://nbc24.com/news/nation-world/discord-app-raises-safety-concerns-as-experts-warn-of-sexual-exploitation-risks-the-national-center-on-sexual-exploitation-purdue-university-dr-kathryn-seigfried-spellar-chat-app-grooming-social-media-platform>; Samantha Murphy Kelly. *The dark side of discord for teens*.

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28 ¹⁷ *The dark side of Discord for teens*, *supra* n.9.

1 25. Youth lack the cognitive ability and life experience to identify online grooming
 2 behavior by adults and the psychosocial maturity to decline invitations to exchange sexually explicit
 3 or otherwise salacious or violent material and mass-messaging capabilities. At all relevant times,
 4 Discord allowed direct messaging with and by youth without parental notification.

5 26. In 2023, Discord finally began to implement additional safety features for youth. In
 6 July 2023, Discord launched a Family Center that allows for limited parental monitoring of youth
 7 users' activities on Discord.¹⁸ This program is "opt-in," which means youth must choose to include
 8 their parents in the Family Center in order for it to be effective. In October 2023, Discord launched
 9 the "Teen Safety Assist" initiative to attempt to address some of the risks to youth users.¹⁹ Two of
 10 the new features include a safety alert to a teen user when a teen user receives a direct message from
 11 a user for the first time and a content filter that automatically blurs sensitive content received
 12 through a direct or group message.²⁰

13 27. Discord's defective and harmful product features present unreasonable risks of harm
 14 to youth users and have directly harmed youth users. Because Discord allows fake usernames, does
 15 not verify age, does not facilitate parental controls, and misleads users to believe that there is a
 16 "safe" messaging option, youth have been groomed, exploited, and abused by other users through
 17 Discord without protection, as well as exposed to harmful content, such as self-harm and violent
 18 material.²¹ Discord enables sexual predators to text, call, and video chat with youth users and prey
 19 on their vulnerabilities.

20 28. Without the appropriate safety features for youth, youth users have found their way to
 21 chat rooms that share information about self-harm or eating disorders, have been subjected to sexual

23 ¹⁸ *Stay Connected with Your Teen Using Discord's Family Center*, Discord Blog (July 11, 2023),
<https://discord.com/blog/discord-family-center-stay-connected-with-your-teen>.

24 ¹⁹ *How We're Making Discord the Best Place to Hang Out and Have Fun with Your Friends*,
 25 Discord Blog (Oct. 19, 2023), <https://discord.com/blog/best-place-to-hang-out-with-friends>.

26 ²⁰ *Id.*

27 ²¹ *The dark side of Discord for teens*, *supra* n.9; Kellen Browning, *How Discord, Born From an*
Obscure Game, Became a Social Hub for Young People, N.Y. Times (Dec. 29, 2021),
<https://www.nytimes.com/2021/12/29/business/discord-server-social-media.html>.

1 exploitation and manipulation by sexual predators, and have had exploitative content shared via
 2 Discord's servers.²² A June 2023 report found that since Discord's launch, at least 35 criminal
 3 prosecutions involving charges of kidnapping, grooming, or sexual assault and 165 prosecutions
 4 related to child sexual abuse included communications using Discord.²³

5 29. Discord's own transparency reports reveal that it received over 416,000 reports
 6 related to child safety from October 2023 to December 2023 alone.²⁴ It also received over 895,000
 7 reports for exploitative and unsolicited content.²⁵

8 30. Discord's design features and conduct facilitating the abuse of youth and exacerbating
 9 the spread of CSAM have caused Plaintiff to divert and increase resources and expenditures to
 10 provide education, counseling, disciplinary, and other social services to harmed youth.

11 **D. Additional Allegations Against Defendant Roblox**

12 31. Roblox is an online gaming platform officially launched by Roblox Corporation in
 13 2006. The company describes its product as a "virtual universe" in which users can create and play
 14 games, engage with other users, and take part in other online experiences. The website claims:
 15 "Roblox is free to play and safe for kids aged 4+."

16 32. Roblox reports 79.5 million daily active users, including more than half of all
 17 American children under 16.²⁶ Forty percent of users are preteens.²⁷

19 22 *The dark side of Discord for teens, supra n.9.*

21 23 Ben Goggin, Child predators are using Discord, a popular app among teens, for sextortion and
 22 abductions, NBC News (June 21, 2023), <https://www.nbcnews.com/tech/social-media/discord-child-safety-social-platform-challenges-rcna89769>.

23 24 Discord, *Transparency Reports* (Jan. 16, 2024), <https://discord.com/safety-transparency-reports/2023-q4>.

24 25 *Id.*

25 26 Taylor Lyles, *Over half of US kids are playing Roblox, and it's about to host Fortnite-esque virtual parties too*, The Verge (July 21, 2020), <https://www.theverge.com/2020/7/21/21333431/roblox-over-half-of-us-kids-playing-virtual-parties-fortnite>.

27 27 Olivia Carville and Cecilia D'Anastasio, *Roblox's Pedophile Problem*, Bloomberg (July 22, 2024), <https://www.bloomberg.com/features/2024-roblox-pedophile-problem/>.

1 33. Roblox encourages users, including kids, to spend money on in-game purchases.²⁸
 2 Users purchase Robux [Roblox currency] to then pay for virtual goods or experiences within the
 3 game, including the ability to personalize their virtual avatars with unique clothing or styles. In the
 4 EU, Roblox faces a government complaint over tricking young players into spending money.²⁹

5 34. Roblox went public via direct listing in 2021. Roblox is not profitable; rather, its
 6 stock price is buoyed by the platform's potential advertising revenue given the size of its user base
 7 and the hours they spend online.³⁰ As such, to maximize potential profit, the game is designed to
 8 keep its users, including children, engaged for as long as possible.

9 35. Roblox is ubiquitous among children. The company reports that nearly 75 percent of
 10 American children ages 9 through 12 regularly play Roblox with friends.³¹ A December 2017 study
 11 reported that young children – ages 5 to 9 – spent more time playing Roblox than any other online
 12 computer activity.³² For children ages 9 through 18, Roblox came second to only YouTube. These
 13 numbers skyrocketed during the Covid-19 pandemic.³³

14 36. Roblox, with its chat functions and interactive games, is a *de facto* social network for
 15 children. Roblox markets its product specifically to children and their parents. For example, Roblox

17 ²⁸ Katherine Latham, *How computer games encourage kids to spend cash*, BBC (May 15, 2023),
 18 <https://bbc.com/news/business-65372710>.

19 ²⁹ Foo Yun Chee, *Videogame firms hit with EU complaint over 'tricking consumers'*, Reuters (Sept.
 20 12, 2024), <https://www.reuters.com/technology/videogame-firms-hit-with-eu-complaint-over-tricking-consumers-2024-09-11/>.

21 ³⁰ Ahmen Abdulazez Abdulkadir, *Roblox stock gains favor as analyst points to future ad growth and developer changes*, Investing.com (Oct. 28, 2024), <https://in.investing.com/news/company-news/roblox-stock-gains-favor-as-analyst-points-to-future-ad-growth-and-developer-changes-93CH-4492474>.

23 ³¹ Shannon Lio, *How Roblox became the 'it' game for tweens – and a massive business* (Oct. 29,
 24 2020), <https://www.cnn.com/2020/10/27/tech/roblox-explainer/index.html>.

25 ³² *Roblox Emerges as a Top Online Entertainment Platform for Kids and Teens in 2017* (Mar. 21,
 26 2018), <https://ir.roblox.com/news/news-details/2018/Roblox-Emerges-as-a-Top-Online-Entertainment-Platform-for-Kids-and-Teens-in-2017/default.aspx>.

27 ³³ Ari Levy, *While parents Zoom, their kids are flocking to an app called Roblox to hang out and play 3D games*, CNBC (Apr. 8, 2020), <https://www.cnbc.com/2020/04/08/roblox-is-seeing-a-surge-during-coronavirus-shelter-in-place.html>.

1 has encouraged schools and other organizations to use Roblox as a tool to teach kids coding,
 2 highlighting “Roblox Educators” on their website.³⁴

3 37. According to a report from the National Center on Sexual Exploitation (NCOSE),
 4 many of the games on Roblox contain sexually explicit themes, including strip clubs and dance
 5 clubs. Under-13 users have access to much of this adult content.³⁵ Youth have reported being lured
 6 into virtual sexual experiences, including so-called “condo experiences,” which involve visiting
 7 someone’s “home,” and then being invited into the “bedroom” for virtual sexual acts. The NCOSE
 8 also reported children playing a so-called “rape game.”³⁶

9 38. In some groups, members openly solicit sexual favors and the trading of child
 10 pornography, often offering Robux in exchange for explicit photos.³⁷ Users can also create porn
 11 videos in Roblox Studio, giving rise to a new genre of “animated” porn. Underage users, including
 12 those under 9, may encounter sexually explicit images, hate speech, or violent content in all-ages
 13 experiences. For example, one game is titled “Beat Up Homeless Outside 7/11 Simulator” and is
 14 available for users that self-identify as 13 plus.

15 39. According to a research report by Hindenburg Research, one former employee said
 16 that employees face pressure to not implement safety features that might cause users to leave the
 17 platform or otherwise reduce engagement.³⁸

18 40. Roblox has failed to keep children safe on its platform. Although the company is
 19 aware that the platform allows adult predators to reach children, Roblox does not verify the age and
 20 identity of its users. Neither does it require parental approval for underage users of its platform. It
 21 takes less than one minute to create an account.

22 ³⁴ See <https://education.roblox.com/educators/>[tps://create.roblox.com/docs/education/resources/roblox-educators](https://create.roblox.com/docs/education/resources/roblox-educators).

23
 24 ³⁵ *Roblox: Inflated Key Metrics For Wall Street and A Pedophile Hellscape For Kids*, Hindenburg
 Research (Oct. 8, 2024), <https://hindenburgresearch.com/roblox/>.

25 ³⁶ https://endsexualexploitation.org/wp-content/uploads/Roblox-Notification-Letter_DDL-2023_FINAL.pdf.

26
 27 ³⁷ *Roblox: Inflated Key Metrics For Wall Street and A Pedophile Hellscape For Kids*, *supra* n.35.

28 ³⁸ *Id.*

1 41. Roblox rejected features that current and former employees recommended.³⁹ For
 2 example, the company rejected pop-up safety notices and defaulting safety settings to disallow users
 3 from talking to strangers. According to some employees, the company is too reliant on AI to
 4 moderate chats even though the technology is not capable of detecting subtle signs of grooming.⁴⁰
 5 The company, including top management, also rejected a proposal by its employees that would have
 6 required users under 13 to sign up with a parent's approval and provide a parent's email address.⁴¹

7 42. Child sexual abuse is rampant on Roblox. In 2023, Roblox reported over 13,000
 8 incidents to the National Center for Missing and Exploited Children, according to the Bloomberg
 9 report.⁴² Since 2018, police in the US have arrested around 24 predators for grooming and abusing
 10 victims on Roblox.⁴³ For example, in 2023, a California man was arrested after traveling across the
 11 country to sexually abuse a 14-year-old he met and groomed on Roblox. Another 14-year-old girl in
 12 Ohio was sexually assaulted by a man she met on Roblox. The man posed as a 17-year-old on the
 13 platform and convinced the girl to send him nude images before picking her up from school and
 14 sexually assaulting her. One 48-year-old registered sex offender in Kansas lured an 8-year-old girl
 15 into giving him 20 explicit images and videos she had shot of herself using her iPad with the promise
 16 of exchanging Robux.⁴⁴

17 **E. Social Media Has Had a Harmful Effect on Monroe County**

18 43. Plaintiff Monroe County is uniquely harmed by the current youth mental health crisis.
 19 The county helps fund the Monroe Community Mental Health Authority, a certified community
 20 behavioral health clinic designed to provide a comprehensive range of mental health and substance
 21 use disorder services. The County's mental health services for youth include outpatient therapy,

22
 23 ³⁹ Olivia Carville, *supra* n.27.

24 ⁴⁰ *Id.*

25 ⁴¹ *Roblox: Inflated Key Metrics For Wall Street and A Pedophile Hellscape For Kids*, *supra* n.35.

26 ⁴² Olivia Carville, *supra* n.27.

27 ⁴³ *Id.*

28 ⁴⁴ *Id.*

1 youth diversion services, intensive crisis stabilization services for teens and children, home-based
2 services focusing on youth-guided treatment, crisis mobile units, and after-hours crisis services.

3 44. Plaintiff Monroe County also funds programs in partnership with the local school
4 districts. The county funds, in part, a resource officer for each school district. In addition to safety
5 services, the school resource officer provides instruction on social media related issues, including
6 youth mental health, cyberbullying, and online safety. The county also funds a community-based
7 educational and behavioral support program for kids who have been identified as at-risk and are
8 between the ages of 11-14. Despite all of the programs and services it offers and funds, Monroe
9 County service providers are struggling to provide enough mental health services because of the
10 increase in youth seeking these services.

11 45. Plaintiff Monroe County has borne increased costs and expenses in response to the
12 youth mental health crisis. These costs include allocating funding for, among other expenses:

13 (a) hiring additional mental health personnel to focus on youth mental health;
14 (b) developing additional mental health resources including mental health
15 programs for youth, family-based mental health services, crisis stabilization services for youth,
16 outpatient mental health programs, mobile crisis programs, youth peer support services, and family
17 support services;

18 (c) training mental health workers, social workers, and other personnel to help
19 youth with their mental health, including assessment and diagnosis tools, suicide prevention
20 approaches, trauma-focused cognitive behavior therapy, and certified peer support programs for
21 young adults;

22 (d) producing and distributing educational materials on social, emotional, and
23 mental health for youth, including suicide prevention materials;

24 (e) coordinating and delivering mental health care services to youth within the
25 county, including offering assessments, youth therapy, and suicide prevention efforts;

26 (f) supporting families and caretakers of youth with mental health diagnoses
27 through family-driven services, parent support services, and caregiving coaching;

1 (g) increasing intervention services and hiring additional personnel to address
 2 property damaged as a result of youth acting out because of mental, social, and emotional problems
 3 caused by defendants' conduct;

4 (h) investigating and responding to threats made over social media; and

5 (i) increasing resources to law enforcement and other diversionary services to
 6 address increase in anti-social and criminal behavior by youth.

7 **F. Social Media Has Had a Harmful Effect on the Youth in Monroe
 8 County**

9 46. The Michigan Departments of Education and Health and Human Services conduct a
 10 bi-annual student health survey of youth in grades 7, 9, and 11.⁴⁵ The 2023-2024 school year survey
 11 found that: (a) 40% of ninth and eleventh graders felt sad or hopeless almost every day for two
 12 weeks or more in a row during the past 12 months; (b) 18% of seventh graders and 13% of ninth and
 13 eleventh graders had read email or website messages that contained threats to other students one or
 14 more times during the past 12 months; (c) 27% of seventh graders and 23% of ninth and eleventh
 15 graders had read email or website messages that spread rumors about other students one or more
 16 times during the past 12 months; and (d) 24% of seventh graders and 21% of ninth and eleventh
 17 graders had been electronically bullied in the past 12 months.⁴⁶ Additionally, students surveyed in
 18 2023-2024 reported high levels of planned and attempted suicide: 14.3% of Monroe County ninth
 19 and eleventh graders reported planning a suicide and 11.2% reported actually attempting suicide in
 20 the past year. In many cases, behavioral issues in Monroe County are directly related to defendants'
 21 social media platforms.

22 47. Monroe County has struggled with threatening social media posts. On December 6,
 23 2021, a 15-year-old student posted on Snapchat and other social media platforms threatening a
 24 shooting at Monroe High School and Orchard High School. Both schools were closed the following
 25

26 ⁴⁵ Monroe County, Michigan Profile for Healthy Youth (MiPHY) <https://mi-suddr.com/michigan-profile-for-healthy-youth-mipy/>.

27
 28 ⁴⁶ *Id.*

1 day in response to the threat.⁴⁷ That same day, a middle-school student reported another threat at the
 2 Airport Community Schools in an effort to shut the school down.⁴⁸

3 48. On September 7, 2024, a student disseminated a threat of gun violence against
 4 Whiteford Agricultural School via a group chat on social media.⁴⁹ The post included a photo of a
 5 firearm. Classes were cancelled the following Monday across the district.

6 49. On September 11, 2024, another Monroe County school district responded to a threat
 7 circulating on Snapchat. As a result, school resource officers were forced to conduct an
 8 investigation into the validity of the post in connection with Airport Community Schools.⁵⁰

9 50. The Social Media Platforms have also facilitated bullying in Monroe County schools.
 10 In one instance, a Monroe County eighth grader committed suicide after being bullied over social
 11 media.⁵¹

12 51. Monroe County has been forced to divert resources and expend additional resources
 13 in an attempt to address the decline in youth mental, emotional, and social health within its
 14 jurisdiction.

15 52. Monroe County requires significantly greater and long-term funding to address the
 16 nuisance defendants have created. It is time, as President Biden declared, to get “all Americans the
 17 mental health services they need.”

18 **G. Defendants Employ Artificial Intelligence in Ways that Expose Youth
 19 to Harmful Experiences**

20 53. Defendants utilize AI and machine learning through the development and operation of
 21 features, including the release of original content, that are inherently dangerous and harmful to

22 ⁴⁷ <https://www.mlive.com/news/ann-arbor/2021/12/teens-arrested-for-threats-against-monroe-county-schools.html>.

23 ⁴⁸ *Id.*

24 ⁴⁹ <https://www.cbsnews.com/detroit/news/15-year-old-female-taken-into-custody-after-online-threat-to-shoot-up-school/>.

25 ⁵⁰ <https://www.wlen.com/2024/09/11/monroe-county-sheriffs-office-investigates-school-threat-not-deemed-credible/>.

26 ⁵¹ <https://nbc24.com/news/local/national-nonprofit-to-investigate-bullying-related-suicide-of-monroe-8th-grader>.

1 youth. These features serve to facilitate compulsive use, overuse, and addiction by youth users, as
 2 well as expose youth to harmful experiences due to the lack of meaningful protections for youth
 3 users.

4 54. Defendants' use of AI and machine learning falls into at least three categories: the use
 5 of AI to promote addictive use; AI machine learning to conduct content moderation; and the
 6 development and publication of AI-generated original content, including, but not limited to, through
 7 large language models such as chatbots.

8 55. Defendants, including Google, YouTube, Meta, Facebook, Snap, Discord, and
 9 TikTok, intentionally design and operate their platforms to maximize users' screen time through the
 10 use of features intended to exploit human psychology using complex algorithms driven by advanced
 11 AI and machine-learning systems. For example, YouTube has developed and operates machine
 12 learning technology with the goal of increasing the amount of time users spend watching content on
 13 YouTube. The AI-driven suggestions succeed in maximizing user engagement. YouTube Chief
 14 Product Officer Neal Mohan stated in 2018 that YouTube's AI-driven recommendations are
 15 responsible for 70% of the time users spend on YouTube.⁵² In other words, 70% of all YouTube
 16 content that users watch was recommended to users by YouTube's machine learning technology, as
 17 opposed to users purposely searching for and identifying the content they watch. Defendants have
 18 failed to implement effective parental controls to prevent such activity from causing harm to youth.
 19 Defendants have failed to implement effective tools for youth/parent users to choose to avoid such
 20 problematic and harmful experiences.

21 56. Meta also uses AI to keep users engaged. Rather than display information
 22 chronologically, posts are displayed based on a user's previous online activity, including whether the
 23 user previously "share[d]," "like[d]," or otherwise engaged with similar content.⁵³ In March 2024,
 24 Meta unveiled that it will begin using a new artificial model across all its Social Media Platforms

25 ⁵² Joan E. Solsman, *YouTube's AI is the puppet master over most of what you watch*, CNET
 26 (Jan. 20, 2018), <https://www.cnet.com/tech/services-and-software/youtube-ces-2018-neal-mohan/>.

27 ⁵³ Email from Nick Clegg to Mark Zuckerberg, Re: Well-being product strategy and tech
 28 headcount, (Aug. 28, 2021), <https://www.blumenthal.senate.gov/imo/media/doc/13124metadocuments.pdf>.

1 that promises to be even more effective at prolonging the time that users spend online.⁵⁴ Tom
 2 Alison, head of Facebook, said that the new model kept users watching its video “Reels” for 8%-
 3 10% longer, proving that the model was “learning from the data much more efficiently than the
 4 previous generation.” Defendants have failed to implement effective parental controls to prevent
 5 such activity from causing harm to youth. Defendants have failed to implement effective tools for
 6 youth/parent users to choose to avoid such problematic and harmful experiences.

7 57. Second, Defendants rely on AI-driven technology to moderate content on their
 8 platforms, which fail to detect and block inappropriate and harmful content accessed by youth. This
 9 leads to harms, including, but not limited to, youth users getting exposed to CSAM; getting targeted
 10 by adult predators; and finding content that promotes self-harm, such as how to engage in cutting
 11 and hide it from adults. Defendants have failed to implement effective parental controls to prevent
 12 such activity from causing harm to youth. Defendants have failed to implement effective tools for
 13 youth/parent users to choose to avoid such problematic and harmful experiences.

14 58. Third, Defendants have developed and are operating chatbots that engage with users,
 15 including youth users, with original content composed by the applications themselves. For instance,
 16 Meta recently unveiled an AI chatbot with 28 personas, among them the “ride-or-die older sister”
 17 resembling Kendall Jenner, aimed at engaging younger users.⁵⁵ In 2023, Snap added to its feed “My
 18 AI,” an AI chatbot that engages with users, including children, with on-demand text produced by the
 19 application itself. Snapchat developed this “virtual friend” to further increase engagement. It has
 20 features that make its chatbot more “friendly,” such as the option to customize the chatbot’s name,
 21 design a custom bitmoji avatar for it, and include it in group chats with friends.⁵⁶ It is not possible to

22
 23 ⁵⁴ Jonathan Vanian, *Meta is building a giant AI model to power its ‘entire video ecosystem,’ exec*
 24 *says*, CNBC (Mar. 6, 2024), <https://www.cnbc.com/2024/03/06/facebook-working-on-single-ai-model-to-power-all-video-recommendations.html>.

25 ⁵⁵ Eliza Anderson, *Perspective: The troubling premise of Meta’s new AI*, Deseret News (Nov. 25,
 26 2023), <https://www.deseret.com/2023/11/25/23970137/meta-ai-billie-big-sister-artificial-intelligence-tom-brady-kendall-jenner/>.

27 ⁵⁶ Samantha Murphy Kelly, *Snapchat’s new AI chatbot is already raising alarms among teens and parents*, CNN Bus. (Apr. 27, 2023), <https://www.cnn.com/2023/04/27/tech/snapchat-my-ai-concerns-wellness/index.html>.

1 remove the chatbot from a user's feed unless that user pays to subscribe to Snap's premium
 2 subscription service.

3 59. In tests that have been recreated multiple times, Snap's My AI responds to self-
 4 identified youth users with inappropriate and misleading content, including how to hide the smells of
 5 alcohol and marijuana, how to "set the mood" for a minor having sex with a 30-year-old for the first
 6 time, and allows essay writing for self-identified students when asked to do so for a school project.⁵⁷
 7 It even explains to teens how to hide the Snap application from parental monitoring.⁵⁸ In user tests,
 8 the My AI becomes more problematic the longer one chats with it.⁵⁹

9 60. Snap's My AI is also problematic in providing mental health advice to youth users
 10 because it can reinforce confirmation bias, allowing users to continue to feel badly if they approach
 11 the chatbot in a negative mood.⁶⁰ According to Alexandra Hamlet, a clinical psychologist in New
 12 York City: "If a teen is in a negative mood and does not have the awareness desire to feel better, they
 13 may seek out a conversation with a chatbot that they know will make them feel worse. . . . Over
 14 time, having interactions like these can erode [] teens' sense of worth, despite their knowing that
 15 they are really talking to a bot."⁶¹

16 61. Defendants' large language models, such as Snap's My AI, put youth users at an
 17 unreasonable risk of harm and expose youth users to harmful experiences and inappropriate and
 18 dangerous content created by Defendants themselves. Defendants are aware that their AI language
 19 models are "experimental" and yet continue to expose youth to harm through the original content

20⁵⁷ Geoffrey A. Fowler, *Snapchat tried to make a safe AI. It chats with me about booze and sex*, Wash. Post (Mar. 14, 2023), <https://www.washingtonpost.com/technology/2023/03/14/snapchat-myai/>; see also Common Sense Media, AI Initiative, *My AI* (Oct. 19, 2023), <https://www.commonsensemedia.org/ai-ratings/my-ai>.

21⁵⁸ *Id.*

22⁵⁹ *Id.*

23⁶⁰ Sarah Perez, *Several popular AI products flagged as unsafe for Kids by Common Sense Media*, Tech Crunch (Nov. 16, 2023), <https://techcrunch.com/2023/11/16/several-popular-ai-products-flagged-as-unsafe-for-kids-by-common-sense-media/#:~:text=An%20independent%20review%20of%20popular%20AI%20tools%20has,Stable%20Diffusion%2C%20may%20not%20be%20safe%20for%20kids>.

24⁶¹ *Snapchat's new AI chatbot is already raising alarms among teens and parents*, *supra* n.56.

1 they produce.⁶² Defendants have failed to implement effective parental controls to prevent such
 2 activity from causing harm to youth. Defendants have failed to implement effective tools for
 3 youth/parent users to choose to avoid such problematic and harmful experiences.

4 **II. ADDITIONAL CAUSES OF ACTION**

5 **COUNT III**

6 **Violation of the Michigan Consumer Protection Act,
 Mich. Comp. Laws §445.901, et al.
 (Against All Defendants)**

8 62. Plaintiff Monroe County brings this claim under the Michigan Consumer Protection
 9 Act (“MCPA”) as to all defendants.

10 63. The MCPA declares unlawful “[u]nfair, unconscionable, or deceptive methods, acts,
 11 or practices in the conduct of trade or commerce.” Mich. Comp. Laws §445.903(1). The MCPA
 12 defines, among others, the following methods, acts, or practices to be unfair, unconscionable, or
 13 deceptive: causing confusion or misunderstanding as to approval or certification of goods;
 14 representing that goods have approval, characteristics, uses, and benefits that they do not have;
 15 failing to reveal a material fact whose omission tends to mislead or deceive the consumer; making a
 16 representation of material fact that misleads a reasonable person; and failing to reveal facts made
 17 material in light of positive representations of facts. *Id.*

18 64. Defendants are each persons within the meaning of Mich. Comp. Laws §445.902(d),
 19 and their actions, as set forth herein, occurred in the conduct of trade or commerce, Mich. Comp.
 20 Laws §445.902(g).

21 65. During the relevant period and as detailed further herein, Defendants have each
 22 engaged in unfair and deceptive acts or practices in commerce in violation of the MCPA. Defendants
 23 engaged in unfair methods of competition by: (i) designing, marketing, promoting, and operating
 24 their platforms in a manner intended to deluge youth with the most polarizing, titillating,
 25 controversial, emotionally charged, and otherwise salacious material created by third parties and by
 26 defendants themselves; and (ii) using Intermittent Variable Rewards (“IVRs”) or dopamine hits to

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⁶² Geoffrey A. Fowler, *supra* n.57.

1 intentionally alter youth users' behavior, creating habits and addiction so as to maximize the time
 2 youth spend on their respective platforms, despite knowledge of the harms to youth from their
 3 wrongful conduct. Moreover, defendants have expressly spoken falsely in the public domain about
 4 the positive effects of their platforms on youth users. For example in 2021, former YouTube CEO
 5 Susan Wojcicki stated that Google's video platform YouTube is beneficial to adolescents' mental
 6 health; Snap CEO Evan Spiegel similarly stated that Snapchat makes 95% of its users (most of
 7 whom are youth) "feel happy"⁶³; Facebook sought first to conceal and then to downplay and
 8 diminish its own study which found that Instagram use harmed the well-being of teenage girls and
 9 TikTok too has denied that it is subjecting users to harmful experiences.

10 66. Defendants' unfair or deceptive acts or practices in violation of the MCPA offend
 11 Michigan's public policy, are immoral, unethical, oppressive or unscrupulous, as well as malicious,
 12 wanton and manifesting ill will, and cause substantial injury to plaintiffs and their inhabitants.

13 67. Plaintiff's claim rests on Defendants' affirmative conduct, which has resulted in the
 14 current public health crisis among youth mental health.

15 68. Defendants' conduct violated the MCPA by:

16 (a) designing, marketing, promoting, and/or operating their platforms in a manner
 17 intended to maximize the time youth spend on their respective platforms, despite knowledge of the
 18 harms to youth from their wrongful conduct;

19 (b) manipulating users to keep using or coming back to their platforms through
 20 the use of IVRs;

21 (c) intentionally marketing their platforms to children and teens, directly
 22 facilitating the widespread, excessive, and habitual use of their platforms among youth; and

23 (d) knowingly designing and modifying their platforms in ways that promote
 24 excessive and problematic use in ways known to be harmful to children.

25 69. The aforementioned methods, acts, or practices constitute unfair or deceptive acts or
 26 practices within the meaning of §445.903 of the MCPA, including, but not limited to:

27 ⁶³ Rachel Kraus, *Snapchat survey finds that Snapchat makes people happy*, Mashable (Jan. 9,
 28 2019), <https://mashable.com/article/snapchat-happiness-social-media-survey>.

(b) “[r]epresenting that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has sponsorship, approval, status affiliation, or connection that he does not have” in violation of Mich. Comp. Laws §445.903(1)(c); and “[r]epresenting that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another” in violation of Mich. Comp. Laws §445.903(1)(e).

COUNT IV

Fraudulent Misrepresentation and Concealment (Against All Defendants)

12 70. At all times relevant to this litigation, each Defendants concealed and intentionally
13 failed to disclose material facts known to them regarding the dangers of their social media platforms
14 for youth. Defendants sought to further the public perception about the safety of their social media
15 platforms for youth by disseminating false statements to Congress and to the public. Any risk
16 disclosures were substantially understated.

17 71. Each Defendant intended the omission of the concealed facts to deceive Plaintiff, and
18 intended Plaintiff to rely upon the omission.

19 72. Plaintiff was unaware of the concealed facts. Plaintiff, its agents, and the public
20 justifiably relied on the false information Defendants provided to them, both directly and indirectly,
21 as Defendants intended.

22 73. As a result, Plaintiff proceeded under the misapprehension that the youth mental
23 health crisis was a result of conduct by persons other than Defendants and was prevented from
24 taking more effective and earlier steps to respond to the youth mental health crisis.

74. Had Plaintiff known the truth about the concealed facts, Plaintiff would have taken
other steps to correct the false information and address earlier the youth mental health crisis it faced.

1 75. Each Defendant's failure to disclose information about the true level of danger
2 presented by Defendants' social media platforms to Plaintiff's residents deceived Plaintiff and was a
3 substantial factor in causing harm to Plaintiff.

4 76. Plaintiff was damaged due to its justified reliance on each of the Defendants'
5 fraudulent misrepresentations and concealments, which were made with oppression, fraud, or malice.

6 | DATED: March 7, 2025

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